

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL, INC., and  
HONEYWELL INTELLECTUAL  
PROPERTIES, INC.,

Plaintiffs,

v.

AUDIOVOX COMMUNICATIONS CORP.,  
AUDIOVOX ELECTRONICS CORP., NIKON  
CORPORATION, NIKON INC., NOKIA  
CORPORATION, NOKIA INC., SANYO  
ELECTRIC CO., LTD., and SANYO NORTH  
AMERICA,

Defendants.

C.A. No. 04-1337 (JFF)

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HONEYWELL INTERNATIONAL, INC., and  
HONEYWELL INTELLECTUAL  
PROPERTIES, INC.,

Plaintiffs,

v.

APPLE COMPUTER, INC.; ARGUS a/k/a  
HARTFORD COMPUTER GROUP, INC.;  
CASIO COMPUTER CO., LTD.; CASIO, INC.;  
CONCORD CAMERAS; DELL  
INC.; EASTMAN KODAK COMPANY; FUJI  
PHOTO FILM CO., LTD.; FUJI PHOTO FILM  
U.S.A., INC.; FUJITSU LIMITED; FUJITSU  
AMERICA, INC.; FUJITSU COMPUTER  
PRODUCTS OF AMERICA, INC.; KYOCERA  
WIRELESS CORP.; MATSUSHITA  
ELECTRICAL INDUSTRIAL CO.;  
MATSUSHITA ELECTRICAL  
CORPORATION OF AMERICA; NAVMAN  
NZ LIMITED; NAVMAN U.S.A. INC.;  
OLYMPUS CORPORATION; OLYMPUS  
AMERICA, INC.; PENTAX CORPORATION;  
PENTAX U.S.A., INC.; SONY  
CORPORATION, SONY CORPORATION OF  
AMERICA; SONY ERICSSON MOBILE

C.A. No. 04-1338 (JFF)

COMMUNICATIONS AB; SONY ERICSSON  
MOBILE COMMUNICATIONS (USA) INC.;  
TOSHIBA CORPORATION; and TOSHIBA  
AMERICA, INC.

Defendants.

HONEYWELL INTERNATIONAL INC., AND  
HONEYWELL INTELLECTUAL  
PROPERTIES INC.,

Plaintiff,

vs.

CITIZEN WATCH CO., LTD. AND CITIZEN  
DISPLAYS CO., LTD.,

Defendants.

Case No. 1:05 CV 00874 JFF

**DECLARATION OF DAVID BEN-MEIR IN SUPPORT OF DEFENDANTS  
CITIZEN WATCH CO., LTD. AND CITIZEN DISPLAYS CO., LTD.'S  
MOTION FOR SUMMARY JUDGMENT OF NON-INFRINGEMENT**

I, DAVID BEN-MEIR, hereby state as follows:

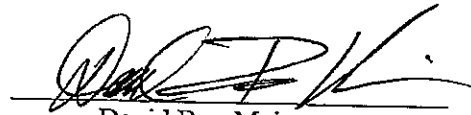
1. I am an attorney at law and licensed to practice law in the State of California, and am a partner of the law firm of Hogan & Hartson, LLP, counsel of record for Defendant Citizen Watch Co., Ltd. and Citizen Display Co., Ltd. (together "Citizen") in this action. I have personal knowledge of the facts set forth herein and if called and sworn as a witness, could and would testify competently thereto.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff's Answers to Citizen Watch Co., Ltd. And Citizen Displays Co., Ltd's First Set of Interrogatories (No. 1-9).

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's First Supplemental Objections and Responses to Citizen Watch Co., Ltd. And Citizen Displays Co., Ltd's Interrogatories No. 1-2.
4. Attached hereto as Exhibit C are true and correct copies of excerpts from the transcript of the March 15, 2007 deposition of Satoshi Kimura.
5. Attached hereto as Exhibit D are true and correct copies of excerpts from the transcript of the March 14-15, 2007 deposition of Terumoto Kimura.
6. Attached hereto as Exhibit E is a true and correct copy of correspondence between Amy Softich, counsel for Plaintiffs, and me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Tokyo, JAPAN, this 22<sup>nd</sup> day of April, 2008.

  
David Ben-Meir